IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

In re: Federal Mogul Global, Inc., et al.,	(Bankruptcy # 01-10578)(RTL)
Debtors.	
THE OFFICIAL COMMITTEE OF ASBESTOS CLAIMANTS and ERIC D. GREEN, as the LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS CLAIMANTS, Plaintiffs,	
v.	Civil Action No. 05-59 JHR
ASBESTOS PROPERTY DAMAGE COMMITTEE,)))
Defendant.))

PLAINTIFFS' DISCLOSURE OF FACT WITNESSES

Pursuant to this Court's Case Management Order dated March 30, 2005, the Official Committee of Asbestos Claimants (the "ACC") and Eric D. Green, the duly appointed legal representative for future asbestos personal injury claimants (the "Futures Representative," together with the ACC, the "Plaintiffs") hereby identify the following fact witnesses whom they intend to call at the Asbestos Claims Estimation Hearing, which is scheduled to begin on June 14, 2005:

Paul Hanly, Esquire

Andrea Crichton

The Plaintiffs reserve the right to call in their direct case any witness identified on any other party's fact witness disclosure list. If any other party refuses to stipulate to the

WP3:1102298 2 59066 1001 authenticity of any of the Plaintiffs' trial exhibits, or that an exhibit which qualifies as a business record within the meaning of Federal Rule of Evidence 803(6) is in fact a business record, the Plaintiffs reserve the right to call an appropriate custodian of records from Federal Mogul, Turner & Newall, or their agents, to lay a foundation to establish the authenticity and admissibility of a particular document.

Dated: Wilmington, Delaware April 15, 2005

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WP3:1102298 2 59066 1001 authenticity of any of the Plaintiffs' trial exhibits, or that an exhibit which qualifies as a business record within the meaning of Federal Rule of Evidence 803(6) is in fact a business record, the Plaintiffs reserve the right to call an appropriate custodian of records from Federal Mogul, Turner & Newall, or their agents, to lay a foundation to establish the authenticity and admissibility of a particular document.

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2005, I electronically filed a true and correct copy of Plaintiff's Disclosure of Fact Witnesses with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that on April 15, 2005, I caused the Plaintiff's Disclosure of Fact

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